

EXHIBIT G

Deposition of Former KCDAO
Detective-Investigator Christopher
Salsarulo in *Quezada v. Brown*, 08 CV
5088 (E.D.N.Y.), Jan. 19, 2012

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE EASTERN DISTRICT OF NEW YORK
4 Case No. 08-CV-5088 (KAM) (VVP)
5

6 -----x
RUDDY QUEZADA,

7
8 Petitioner,

9 v.

10
11 WILLIAM BROWN, Superintendent,
12 Eastern NY Correctional Facility,
13

14 Respondent.
15 -----x

16 DEPOSITION OF CHRISTOPHER SALSARULO

17 New York, New York

18 Thursday, January 19, 2012
19
20

21 Reported by:

Amy A. Rivera, CSR, RPR, CLR

22 JOB NO. 45619
23
24
25

January 19, 2012

1:13 p.m.

Deposition of CHRISTOPHER

SALSARULO held at the office of HUGHES,
HUBBARD, & REED, LLP, One Battery Park
Plaza, New York, New York, pursuant to
Notice, before Amy A. Rivera, Certified
Shorthand Reporter, Registered Professional
Reporter, Certified LiveNote Reporter, and a
Notary Public of the State of New York.

A P P E A R A N C E S:

HUGHES HUBBARD & REED

Attorneys for Petitioner

One Battery Park Plaza

New York, New York 10004

BY: DAVID B. SHANIES, ESQ.

GABRIELLE Y. VAZQUEZ, ESQ.

KINGS COUNTY DISTRICT ATTORNEY'S OFFICE

Attorneys for Respondent

Renaissance Plaza at

350 Jay Street

Brooklyn, New York 11201

BY: PHYLLIS MINTZ, ESQ.

MARIE-CLAUDE WRENN, ESQ.

Assistant Executive District Attorneys

1 CHRISTOPHER SALSARULO

2 C H R I S T O P H E R S A L S A R U L O, having
3 been duly sworn, testified as follows:

4 EXAMINATION

5 BY MR. SHANIES:

6 Q. Good afternoon, sir.

7 A. Good afternoon.

8 Q. Just before we get into questions, I
9 just want to go over a couple preliminary things,
10 pretty standard requests for a deposition, just
11 that we try to not to talk over each other so that
12 the court reporter can take down both of our
13 statements. And if you can, try to remember to
14 give verbal answers so that, again, for the court
15 reporter.

16 Other than that, if you don't
17 understand a question, please let me know and I'll
18 be happy to clarify. And if you don't know the
19 answer, that's fine, too, just let me know.

20 Is that fair enough?

21 A. That is fair.

22 Q. Okay. So, can you tell me, please,
23 where you're currently employed?

24 A. Yes. I'm a Special Agent with the
25 Drug Enforcement Administration in New Jersey.

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Q. And when did you begin that employment?

A. I believe it was around -- it was the fall of 1995, around September, I believe.

Q. And prior to that, where were you employed?

A. By the Kings County District Attorney's office.

Q. And when did you begin at the DA's office?

A. I'm not sure of the date. I'm thinking it was around 1992, or so. Yeah, I think 1992.

Q. Was that your first employment or were you employed elsewhere before that?

A. Well, I had jobs since I was 16, but before that, out of college, I worked for -- actually, across the street, at Bear Stearns & Company, 2 Broadway.

Q. Maybe let's go in order. So, immediately before the DA's office in '92, Bear Stearns was your job directly before that?

A. No. I left Bear Stearns and went to work for the family business. My family has a

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2 MS. VAZQUEZ: We can take a break.

3 MS. MINTZ: Just take a stretch.

4 MR. SHANIES: Do you want to take 5,
5 10 minutes.

6 MS. MINTZ: Yes.

7 MR. SHANIES: All right.

8 (Recess.)

9 BY MR. SHANIES:

10 Q. Do you know someone named Tom Buda,
11 B-U-D-A?

12 A. I don't believe I do.

13 Q. Have you heard his name since you've
14 been contacted about this case?

15 A. This morning ADA Mintz mentioned that
16 name and I said I didn't remember that name.

17 Q. You don't recall whether -- or do you
18 recall -- let me start over and strike that.

19 Do you recall whether Tom Buda was
20 present on March 11th or March 12th, 1993?

21 A. I do not recall.

22 Q. Do you recall anything about that
23 detective?

24 A. No.

25 Q. When you executed material witness

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2 orders, did you always keep the person in a hotel
3 or only some of the time?

4 A. I don't remember if all material
5 witnesses were placed in a hotel or not.

6 Q. That did happen sometimes though,
7 right?

8 A. Yes.

9 Q. And one of your jobs was to stay with
10 the person while they were in the hotel?

11 A. Yes.

12 Q. Do you recall whether you went to a
13 hotel on March 11th or 12th, 1993?

14 A. I do not.

15 Q. What would you typically do while you
16 were at a hotel with someone subject to a material
17 witness order?

18 A. We would check into the hotel, get two
19 adjoining rooms, where you could pass through from
20 one room to the other. The material witness would
21 then have free range of the room.

22 We would usually lock his door -- his
23 or her door to the outside so that person would
24 have a difficult time getting out. If he or she
25 tried to get out, it would have to physically be

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2 through, you know, us to get out through our door.

3 Most of the time I remember everybody
4 watched TV, ordered some food, and then the
5 detective investigators would work a shift until
6 either that person, the material witness, would be
7 brought back to the DA's office or a couple other
8 DIs would come to relieve us.

9 Q. And how did you lock the hotel door?

10 A. We usually take a set of handcuffs and
11 secure it somehow so it would be very difficult
12 for the material witness to get out through that
13 door.

14 Q. Did you ever have a material witness
15 try to get out.

16 A. I don't believe so. I don't remember
17 that happening to me.

18 Q. Do you recall if Sixto tried to get
19 out?

20 A. I do not remember.

21 Q. Were both of the assigned detectives
22 required to be with the person in custody at all
23 times?

24 A. Okay, to be more specific, during like
25 a custody in a hotel, yes, two people had to be

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2 present at all times.

3 Q. So, in adjoining rooms, was the
4 connecting door always open?

5 A. Yes.

6 Q. And would the person in custody go to
7 sleep if they were there overnight?

8 A. Probably. I would say most of the
9 time.

10 Q. Did you sleep also?

11 A. Sometimes we would take naps, yes.

12 Q. You would take turns?

13 A. Yes.

14 Q. And were they allowed to have visitors
15 while they were in custody?

16 A. I don't believe so.

17 Q. Were they allowed to make phone calls?

18 A. I think that was dependent on
19 instructions by the ADA.

20 Q. Do you remember whether Sixto made any
21 phone calls?

22 A. I do not.

23 Q. Do you recall -- do you recall a
24 logbook that you maintained regarding the
25 movements of the person in custody?